

**From:** [Chen, Isaac](#)  
**To:** [Gillespie, David](#)  
**Subject:** FW: current and potential linkages between EPA and BSEE data  
**Date:** Thursday, June 16, 2016 1:28:00 PM

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David,  
FYI.

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**From:** Angove, Sharon  
**Sent:** Thursday, June 16, 2016 12:59 PM  
**To:** Larsen, Brent <Larsen.Brent@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>  
**Cc:** Mohon, Mitty <mohon.mitty@epa.gov>; Houston, Robert <Houston.Robert@epa.gov>; Peters, Carol <Peters.Carol@epa.gov>; Johnsey, Paulette <Johnsey.Paulette@epa.gov>  
**Subject:** RE: current and potential linkages between EPA and BSEE data

I was under the gun to get my last email out (my computer was about to kick me out for a mandatory system update) so I did not get to finish my thought.

When I set up the meeting with BOEM/BSEE/EPA HQ, we can fold all of the offshore permits in and discuss (whether it is an eNOI or paper system) how we can better align the data in ICIS so that ECHO can provide better and consistent data. Right now, we are not tracking the types of information HQ has told me they need (for example, they need the actual location for the discharge – the lat/long is not enough – however, BOEM has a Facility Name process that would allow us to better track actual discharge locations).

Also, in my haste to get my email below sent before the system timed me out, I did not get to clarify that EPA's current eNOI system does not validate the Designated Operatorship based on BOEM data. Validating the Designated Operatorship allows only the operator with BOEM's legal authority to discharge to get NPDES coverage. This would be something we would have to build in for the next permit if we make the decision to only grant coverage to Designated Operatorship.

Validating Designated Operatorship means that anyone without legal authority to discharge cannot get NPDES coverage. Any discharge that occurs based on a contract relationship the Designated Operator has would fold under the Designated Operator's coverage. BOEM only issues INC's (Incident of Non-compliance) to the Designated Operatorship; they let the Designated Operatorship go after their contractors if the contractor caused the violation. EPA may want to align with BOEM's Designated Operatorship and any CWA violations would go against the Designated Operatorship (and, like BOEM, we would let the Designated Operatorship go after their contractors who caused the violation). BOEM only holds the Designated Operatorship legally responsible for all violations. This may be a cross-over where EPA and BOEM/BSEE can align.

In addition, the meeting I want to set up will also help us share data with our other EPA Regional counterparts for their offshore permits/eNOI systems so that ECHO can be consistent on offshore data whether it is from the Gulf of Mexico or offshore Alaska.

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*Sharon Angove*

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**From:** Larsen, Brent  
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**To:** Angove, Sharon <[Angove.Sharon@epa.gov](mailto:Angove.Sharon@epa.gov)>; Chen, Isaac <[Chen.Isaac@epa.gov](mailto:Chen.Isaac@epa.gov)>  
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**Subject:** RE: current and potential linkages between EPA and BSEE data

Just a thought, but the two Texas waters permits are still going to be paper NOIs. Any additional info for their NOIs?

Takk,

Brent E. Larsen  
Chief, Permitting Section (6WQ-PP)  
NPDES Permits and TMDL Branch  
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214-665-7523

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**From:** Angove, Sharon  
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**Subject:** FW: current and potential linkages between EPA and BSEE data

Brent / Isaac,

Based on the information below, as well as subsequent phone calls I have had with Carey and Jesse, we may be looking at making some changes to our next OCS General Permit in terms of what we need to track.

I am presently working with my BOEM/BSEE contacts to set up a face-to-face meeting (very soon) to discuss how we can better align what we need in order for ECHO to provide better data. For example, EPA's eNOI system can "validate" (based on Business Rules) that a particular company applying for NPDES coverage has legal authority to discharge on a particular location based on BOEM's record of who was awarded Designated Operatorship. More on that soon.

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*Sharon Angove*

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**From:** Johnston, Carey  
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**Cc:** Yourish, Jesse <[yourish.jesse@epa.gov](mailto:yourish.jesse@epa.gov)>; Barrette, Michael <[Barrette.Michael@epa.gov](mailto:Barrette.Michael@epa.gov)>; Angove, Sharon <[Angove.Sharon@epa.gov](mailto:Angove.Sharon@epa.gov)>; Wilson, Scott <[Wilson.Js@epa.gov](mailto:Wilson.Js@epa.gov)>; Kane, Rebecca <[Kane.Rebecca@epa.gov](mailto:Kane.Rebecca@epa.gov)>  
**Subject:** current and potential linkages between EPA and BSEE data

Hello All -

Thank you to everyone in BSEE that participated in the recent EPA webinar demo of EPA's public access data tool - Enforcement Compliance History Online (ECHO), which is available at <https://echo.epa.gov>. At this demo we ran through a number of ECHO features and explained how ECHO users can search for regulated entities, basic information on pollutant discharges, and compliance status against major statutes (CWA, CAA, RCRA).

After the webinar, EPA staff took a closer look at how EPA is managing the data for offshore oil and gas extraction sector in its data system. We decided it would be helpful to invest some time and resources in better understanding the current and potential linkages between EPA and BSEE data. In particular, we hope to get a current list of facilities (or structures) in the OCS and crosswalk this list against our data system. We would like to be able to answer questions like:

- Number of installations discharging produced water on Federal OCS.
- Annual amount of produced water discharged on the Federal OCS
- Annual average dispersed oil concentration (oil and grease) on the Federal OCS.
- Total amount of dispersed oil (oil and grease) discharged on Federal OCS

....as well as to better locate wastewater discharges in the OCS (currently EPA only shows operator onshore locations on ECHO, not the offshore locations of these discharges).

Please let me and my colleague, Jesse Yourish, know if you have information that would be helpful in linking EPA and BSEE data. In particular, we are we hope to get a current list of facilities (or structures) in the OCS (with each structure having a unique ID, lat/lon, OCS info). We are looking at the Federal OCS (not just the GOM).

Please let me know if you have any questions. Thanks you.

Sincerely,

Carey A. Johnston, P.E.  
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